

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. : DATE FILED: \_\_\_\_\_

ANDRE BAILEY : VIOLATIONS:  
: 18 U.S.C. § 922(g)(1) (possession of a  
: firearm by a felon – 1 count)  
: 26 U.S.C. § 5861(d) (possession of a  
: firearm not registered to the defendant in  
: the National Firearms Registration and  
: Transfer Record  
: Notice of forfeiture

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about May 31, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDRE BAILEY,**

knowing he had previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, at least one of the following: (1) an Aero Precision M5 rifle, bearing serial number US201757, loaded with twenty-five live rounds of .308 caliber ammunition; and (2) an Anderson AM15 .300 caliber rifle, bearing serial number 21395505, and the firearm was in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 31, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANDRE BAILEY,**

knowingly received and possessed a firearm, that is an FGC 9 rifle, with a barrel less than 16 inches in length, bearing no serial number, loaded with twenty-eight live rounds of 9mm ammunition, not registered to the defendant in the National Firearms Registration and Transfer Record, as required by Title 26, United States Codes, Section 5841.

In violation of Title 26 United States Code, Sections 5845(a), 5861(d), and 5871.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 922(g)(1) and Title 26, United States Code, Section 5861(c), set forth in this indictment, defendant

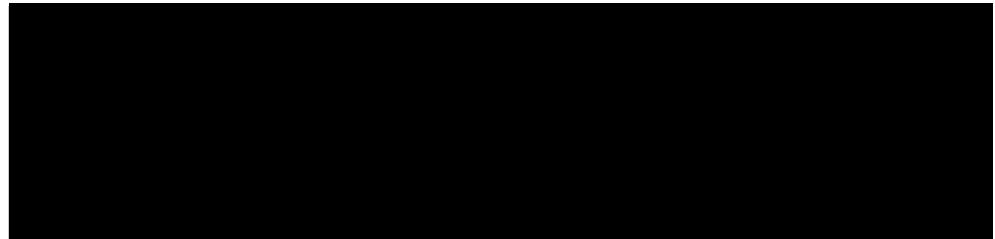
**ANDRE BAILEY**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of the offenses, including, but not limited to:

1. an Aero Precision M5 rifle, bearing serial number US201757;
2. twenty-five live rounds of .308 caliber ammunition;
3. an Anderson AM15 .300 caliber rifle, bearing serial number 21395505;
4. an FGC 9 rifle, with a barrel less than 16 inches in length, bearing no serial number;
5. twenty-eight live rounds of 9mm ammunition;
6. and a second firearm magazine containing twenty-one live rounds of 9mm ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 924(d), and Title 26, United States Code, Section 5872(a).

**A TRUE BILL:**



 /Pm  
**JACQUELINE C. ROMERO**  
**United States Attorney**

No. -----

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

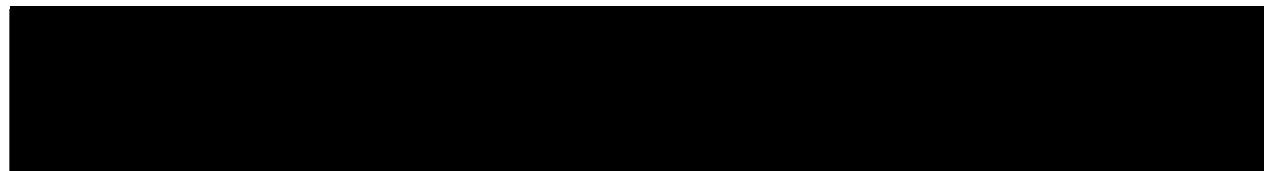
vs.

ANDRE BAILEY

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**INDICTMENT**

18 U.S.C. § 922(g)(1) (possession of a firearm by a felon – 1 count), 26 U.S.C. § 5861(d) (possession of a firearm not registered to the defendant in the National Firearms Registration and Transfer Record)



Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20\_\_\_\_\_

\_\_\_\_\_  
Foreperson

\_\_\_\_\_  
Bail, \$ \_\_\_\_\_